

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CASE NOS. 2:18-cr-095-Z-BR(3)
	§	
KRYSTAL KAO VANG (03)	§	

**DEFENDANTS' JOINT EMERGENCY MOTION TO CONTINUE SENTENCING
HEARING DUE TO A DEATH IN DEFENSE COUNSEL'S FAMILY**

TO THE HONORABLE COURT:

Defendant KRYSTAL KAO VANG files this Joint Emergency Motion to Continue Sentencing Hearing Due to a Death in Defense Counsel's Family and would show as follows:

I.

1. Defendant Krystal Vang is represented by court appointed counsel Tim Newsom. On February 18, 2020, Mr. Newsom's father-in-law was involved in an automobile/pedestrian collision. Mr. Newsom's father-in-law died on February 19, 2020 from the injuries he sustained in the collision. The funeral services will be held in Oxford, Mississippi on February 21, 2020 at 11:00 a.m.

2. The sentencing hearings for both Defendants are set back-to-back on February 21, 2020. Defendants request that both of their sentencing hearings be continued and re-set for the same date for the reasons stated below.

3. Defendants are husband and wife. Defendants were named in the same indictment. (ECF 3). Defendants pled guilty on or about the same date and have been scheduled for sentencing on the same date. Finally, Defendants filed separate motions requesting the court to stagger their sentences, because they are the parents of minor children. (ECF 223, p. 9). For

these reasons, Defendants request that their sentencing hearings be continued and reset for the same date.

4, Defendants have conferred with counsel for the United States regarding this motion. The United States does not oppose this motion.

II.

WHEREFORE, Defendant KRYSTAL KAO VANG respectfully requests the Court to continue the sentencing hearings for both Defendants, and that the hearings be rescheduled for a future date as set by the Court.

Respectfully submitted,

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/s/ Tim Newsom

Attorney for Krystal Kao Vang

CERTIFICATE OF CONFERENCE

This is to certify that on February 19, 2020, counsel for Defendants conferred with Counsel for the United States, Sean Long. The United States does not oppose this motion.

/s/ Tim Newsom
Tim Newsom

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document and that a true and correct copy was served on the parties listed below through the electronic case filing system this 19th day of February, 2020:

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/s/ Tim Newsom
Tim Newsom